

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11  
:  
TS EMPLOYMENT, INC., : Case No. 15-10243 (MG)  
:  
Debtor. :  
:  
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**ORDER AUTHORIZING DISCOVERY PURSUANT TO  
RULE 2004 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Upon the application, dated April 16, 2015 (the “Application”)<sup>1</sup> of James S. Feltman, not individually but solely in his capacity as the Chapter 11 trustee (the “Trustee”) for the above-captioned (the “Debtor”), by his counsel, Togut, Segal & Segal LLP (the “Togut Firm”), for an order authorizing issuance of subpoenas for the production of documents and deposition testimony, it is hereby:

**ORDERED**, that the Application is granted to the extent provided for herein; and it is further

**ORDERED**, that the Trustee is authorized to issue subpoenas for the production of documents and for deposition testimony consistent with Rule 9016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), concerning any asset, liability, duty, obligation, contract, transaction, or other issue related to the Debtor, upon any entity identified in Exhibit A attached hereto, which consists of currently known entities that may be related to the Debtor through common ownership and/or control (the “Affiliates”), and any current or former employee, principal, agent, officer, or owner thereof; any accountant of the Debtor or its Affiliates, including but not limited to Kossoff & Kossoff LLP; Lilling & Company LLP;

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<sup>1</sup> Capitalized terms not defined herein shall have the meanings ascribed in the Application.

Rosen, Seymore, Shapes, Martin & Company LLP; and Crowe Horwath LLP, and any current or former employee, principal, agent, officer, or owner thereof; and Wells Fargo, N.A., or any subsidiary or affiliate thereof which conducted any business with the Debtor or its Affiliates, and any current or former employee, principal, agent, officer, or owner thereof; and it is further

**ORDERED**, if any entity or person who receives a subpoena for the production of documents pursuant to this Order withholds any document on the basis of an asserted privilege, that entity is directed to provide a privilege log in accordance with Bankruptcy Rule 7026 to the Togut Firm, One Penn Plaza, Suite 3335, New York, New York 10119, Attn.: Anthony F. Pirraglia, Esq., so as to be received with the document production required by the subpoena, or at such time as mutually agreed to by the Trustee and the subpoenaed entity or person; and it is further

**ORDERED**, that any subpoena issued pursuant to this Order shall provide at least 14 days notice to the recipient to provide the recipient an opportunity to object to the subpoena or to file any motion with the Court; and it is further

**ORDERED**, that entry of this Order is without prejudice to the rights of the Trustee or any other party to apply for any further relief, including but not limited to further relief under Bankruptcy Rule 2004; and it is further

**ORDERED**, that the Court shall retain jurisdiction to hear and determine any and all matters arising from the interpretation and/or implementation of this Order.

**IT IS SO ORDERED.**

Date: April 16, 2015  
New York, New York

/s/Martin Glenn  
MARTIN GLENN  
United States Bankruptcy Judge

**Exhibit A**

**List of Debtor Affiliated Entities**

1. Tri-State Employment Services Inc.
2. Tri-State Employer Services
3. Broadway PEO, Inc.
4. Carusso Staffing Corp.
5. STS Group, Inc.
6. Tri-State SC, Inc.
7. Tri-Odyssey PEO Inc.
8. Tri-State North Carolina, Inc.
9. TSE-PEO, Inc.
10. Tri-Tel Communications, Inc.
11. Regal USA Construction Inc.
12. Broadway Wallboard, Inc.
13. Corporate Resource Services, Inc.
14. Diamond Staffing Services, Inc.
15. Insurance Overload Services, Inc.
16. Accountabilities, Inc.
17. Corporate Resource Development Inc.
18. TS Staffing Services, Inc.
19. Integrated Consulting Group Inc.
20. Flex Recruitment Plus (UK)
21. The CRS Group Inc.

22. Summit Software, Inc.
23. Nationwide Screening Services
24. The CRS Group Managed Services Provider
25. Tri-State Solutions Inc.
26. Today's PEO Inc.
27. Tri-State Entertainment Production PEO, Inc.
28. National Payroll Service, Inc.
29. Solutions H2 Corp.
30. Justin & Brooks, Inc.
31. Tri-State Staffing, Inc.
32. R & D Metro, Corp.
33. Tri-Diamond Staffing Inc.
34. A Temporary Staffing Inc.
35. Tri-State CRM, Inc.
36. Administrative Support Management, Inc.
37. D&D Staffing Corp.
38. CRS Group of Delaware
39. D&D Staffing of New York, Corp.
40. Insurance Overload Staffing
41. TS Staffing Corp.
42. DC Restaurants, LLC
43. Tri-Overload Staffing Inc.
44. Kevlar Solutions, Inc.

45. Shcarizo Restaurant Group, Inc.

46. R & D Staffing Inc.

47. Tri-State Personet Corp.